

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Defendant.

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## ANSWER TO COMPLAINT

4. S&H admits the allegations in paragraphs 8, 9 and 10 of the Complaint.



1           14.     S&H hereby notifies plaintiff of its intent to seek an award of fees incurred  
2 in defending the action pursuant to RCW 4.84.250 and other law.

3           WHEREFORE, having answered plaintiff's Complaint and counterclaimed as set  
4 forth above, S&H prays for the following relief:

- 5           A.     That plaintiff's claims, and each of them, be dismissed with prejudice;  
6           B.     That to the extent the Court determines that it has jurisdiction, that  
7                 Judgment be entered in favor of S&H;  
8           C.     That S&H be awarded fees and costs to the full extent permitted by law,  
9                 including under RCW 4.84.250 *et seq.*; and  
10          D.     That the Court award such other relief to S&H as is just and appropriate  
11                 under the circumstances.

12           DATED this 18th day of May, 2011.

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14                                 Davis Wright Tremaine LLP  
15                                 Attorneys for Defendant  
16                                 Suttell & Hammer, P.S.

17                                 By s/ Brad Fisher

18                                 Brad Fisher, WSBA #19895  
19                                 Suite 2200  
20                                 1201 Third Avenue  
21                                 Seattle, Washington 98101-3045  
22                                 Telephone: (206) 757-8042  
23                                 Fax: (206) 757-7700  
                                    E-mail: bradfisher@dwt.com

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participant:

Karin Cho  
852 SUMMERHILL RIDGE DR NW  
ISSAQUAH, WA 98027

Declared under penalty of perjury under the laws of the state of Washington dated at Seattle, Washington this 18<sup>th</sup> day of May, 2011

Davis Wright Tremaine LLP  
Attorneys for Defendant Suttell & Hammer,  
P.S.

By s/ Brad Fisher

Brad Fisher, WSBA #19895  
Suite 2200  
1201 Third Avenue  
Seattle, Washington 98101-3045  
Telephone: (206) 757-8042  
Fax: (206) 757-7700  
E-mail: bradfischer@dwt.com